

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff, 12 Civ. 6421 (KMK)

v.

**EDWARD BRONSON, E-LIONHEART
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL**

Defendants

and

FAIRHILLS CAPITAL, INC.

Relief Defendant.

GARNISHEE'S ANSWER

Having been served with a Writ of Garnishment, Garnishee hereby files this Answer.

This Answer is being prepared by:

Name: Paul Rachmuth

Title: Garnishee

Address: 265 Sunrise Highway, Ste. 1515, RVC, NY 11570

Phone Number: 516-330-0170

DESCRIPTION OF GARNISHEE

Garnishee files this Answer as: (check those that apply)

☒ An Individual

☒ In my personal capacity.

☐ Doing business as,

Name of d/b/a:

Address:

Phone Number:

☐ A Partnership; and Garnishee is:

☐ A general partner

☐ A limited partner

Name of Partnership:

Address:

Phone Number:

☐ A Corporation

Name of Corporation:

Address:

Phone Number:

State of Incorporation:

Principal Place of Business:

PRIOR GARNISHMENTS

For each previous garnishment involving Defendant which is still in effect, please provide the following information:

Date of Garnishment: None

Property Subject to the Previous Garnishment:

DESCRIPTION OF PROPERTY IN WHICH DEFENDANT HAS AN INTEREST

Garnishee states as follows: (check those that apply)

☒ From the date the Writ of Garnishment was served to the date this Answer is being prepared, Garnishee has not had possession, custody or control of any property in which Defendant has an interest.

☐ Garnishee has possession, custody or control of the following non-earnings property in which Defendant has an interest:

Description of Property:

Approximate Value of Property:

Defendant's Interest in the Property:

☐ Garnishee anticipates having future possession, custody or control of the following non-earnings property in which Defendant will have an interest:

Description of Property:

Approximate Value of Property:

Defendant's Interest in the Property:

When Defendant Will Acquire An Interest in the Property:

- ☐ As Defendant's employer, Garnishee has possession, custody or control of earnings in which Defendant has an interest:

Defendant is paid: ☐ weekly, ☐ bi-weekly, ☐ semi-monthly, ☐ monthly

Date Previous Pay Period Ended:

Date Current Pay Period Ends:

- a. Defendant's Gross Pay:
- b. Federal Income Tax Withheld:
- c. F.I.C.A. Withheld:
- d. State Income Tax Withheld:
- e. Total Withholdings (b + c + d):
- f. Net Earnings (a - e):

GARNISHEE'S CLAIMS

Garnishee makes the following claims: (check those that apply)

- ☐ Garnishee makes the following claim of exemption on behalf of Defendant:

Amount of Exemption:

Nature of Exemption:

- ☒ Garnishee has the following objections, defenses, or set-offs against the United States' right to seek garnishment of Defendant's non-exempt property in Garnishee's possession, custody or control (describe nature of objection, defense, or set-off):

Defendant owes Garnishee for legal services provided to Defendant. Should Garnishee receive any funds from or for the benefit of the Defendant, Garnishee will exercise his right of set-off under New York and Federal Law.

CERTIFICATE OF SERVICE

Garnishee certifies that it has served a copy of this Answer on both the:

☒ Defendant

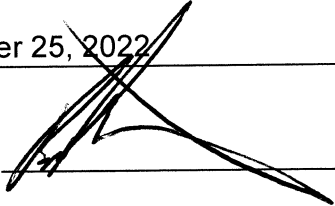
Date of Service: ²⁶October 25, 2022

Method of Service: (include address if service was by mail)
ECF Filing

OATH

Garnishee declares under penalty of perjury that the foregoing is true and correct.

Date: October 25, 2022

Signature: 

Subscribed and sworn before me this 26th day of October 2022.


Notary Public

(SEAL)

Commission Expires: May 2, 2026

BRYAN A. McKENNA
Notary Public, State of New York
No. 02MC5027173
Qualified in Nassau County
Commission Expires May 2, 2022